

# **EXHIBIT 2**

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**This docket is current through 04/28/2025**

Today's Date: 5/28/2025

Source: U.S. District Court, Western District of Washington (Seattle)

Court: U.S. District Court, Western District of Washington (Seattle)  
Case Title: [American Pacific Mortgage Corporation et al v. Everett Financial Inc et al](#)  
Case: 2:21-CV-01088  
Judge: District Judge [Tiffany M. Cartwright](#)  
Date Filed: 08/13/2021  
Case Status: JURYDEMAND, PROTO

**SYNOPSIS INFORMATION**

**Allegations:** Defendant intentionally made misappropriation of trade secrets and to return of all APM property and information to plaintiff's, resulted in damages.  
**Damages:** \$750,000.00 in actual, consequential, special, liquidated, exemplary, special and punitive damages, injunctive relief, fees and costs.

**COMPLAINT (MANUALLY RETRIEVED)**

 [Original Image of this Document \(PDF\)](#)

**CASE INFORMATION**

Case Number: 2:21CV01088  
Jury Demand: Plaintiff  
Nature of Suit: Intellectual Property Rights: Defend Trade Secrets Act of 2016 (DTSA) (880)  
Key Nature of Suit: Intellectual Property; Trade Secrets (260.20)  
Jurisdiction: Diversity  
Cause: [18 USC 1836\(b\) - Civil Action to Protect Trade Secrets](#)

**PARTICIPANT INFORMATION**

**American Pacific Mortgage Corporation**

**Party Description:** a California corporation  
**Type:** Plaintiff  
**Attorney:** [Chad Samuel Hummel](#)  
**Status:** LEAD ATTORNEY; PRO HAC VICE; ATTORNEY TO BE NOTICED  
**Firm Name:** MCKOOL SMITH PC (CA)  
**Firm Address:** ONE CALIFORNIA PLAZA  
300 SOUTH GRAND AVE  
STE 2900  
LOS ANGELES, CA 90071  
**Firm Phone:** 213-694-1200  
**Email Address:** [chummel@mckoolsmith.com](mailto:chummel@mckoolsmith.com)  
**Attorney:** [Makenna Miller](#)  
**Status:** LEAD ATTORNEY; PRO HAC VICE; ATTORNEY TO BE NOTICED  
**Firm Name:** MCKOOL SMITH PC (CA)  
**Firm Address:** ONE CALIFORNIA PLAZA  
300 SOUTH GRAND AVE  
STE 2900  
LOS ANGELES, CA 90071  
**Firm Phone:** 213-694-1154

68	11/02/2023	MINUTE ORDER SETTING TRIAL AND PRETRIAL DATES by District Judge Tiffany M. Cartwright. The Court grants parties' request for two phase discovery. *10 DAY* Jury Trial is set for 1/13/2025 at 09:00 AM in Courtroom C before District Judge Tiffany M. Cartwright. Joinder of Parties due by 1/31/2024, Amended Pleadings due by 2/12/2024, Fact Discovery completed by 5/15/2024, Expert Witness Disclosure/Reports under <b>FRCP 26(a)(2)</b> due by 6/17/2024, Rebuttal Expert Disclosure/Reports due by 7/17/2024, Discovery Motions due by 7/17/2024, Expert Discovery completed by 8/16/2024, Dispositive motions due by 9/16/2024, Motions in Limine due by 12/9/2024, Pretrial Order due by 12/23/2024, Voir dire/jury instructions/trial briefs due by 12/23/2024, Agreed Neutral Statement of the Case due by 12/23/2024, Deposition Designations due by 12/23/2024, Pretrial Conference set for 12/31/2024 at 01:30 PM in Courtroom C before District Judge Tiffany M. Cartwright. (MET) (Entered: 11/02/2023)	<a href="#">View</a>	<a href="#">Add to request</a>
67	10/31/2023	JOINT STATUS REPORT signed by all parties. Estimated Trial Days: 7 to 10. (David, Rabindra) (Entered: 10/31/2023)	<a href="#">View</a>	<a href="#">Add to request</a>
66	10/27/2023	ORDER denying Defendants' <a href="#">43</a> Motion for Attorney Fees. Signed by District Judge Tiffany M. Cartwright. (MW) (Entered: 10/27/2023)	<a href="#">View</a>	<a href="#">Add to request</a>
65	10/27/2023	Supplemental BRIEF re <a href="#">43</a> MOTION for Attorney Fees by All Defendants (Lyons, Marina) (Entered: 10/27/2023)	<a href="#">View</a>	<a href="#">Add to request</a>
64	10/27/2023	Supplemental BRIEF re <a href="#">44</a> Brief in Response to the Court's Inquiry Regarding Defendants' Request for Attorney's Fees by Plaintiffs American Pacific Mortgage Corporation, Element Mortgage (David, Rabindra) (Entered: 10/27/2023)	<a href="#">View</a>	<a href="#">Add to request</a>
63	10/25/2023	MINUTE ORDER. The parties' joint motion to withdraw as attorney for Defendant Luke Welling ("Defendant") <a href="#">62</a> does not contain the signature of Defendant or his new counsel as is required for	<a href="#">Send Runner to Court</a>	

3	08/16/2021	NOTICE of Appearance by attorney Maren Calvert on behalf of Plaintiffs American Pacific Mortgage Corporation, Element Mortgage. (Calvert, Maren) (Entered: 08/16/2021)	<a href="#">View</a>	<a href="#">Add to request</a>
2	08/16/2021	Notice of Filing Deficiency re 1 Complaint.,. ***Action Required*** Improper Signature - Secondary Attorney(s). See attached letter for more information and instructions. (CDA)ad hoc attorneys T Calvert and M Calvert (Entered: 08/16/2021)	<a href="#">View</a>	<a href="#">Add to request</a>
	08/16/2021	Judge Ricardo S. Martinez added. (CDA) (Entered: 08/16/2021)	<a href="#">Send Runner to Court</a>	
	08/16/2021	NOTICE Pursuant to Fed.R.Civ.P 7.1, Plaintiff(s) must file a Corporate Disclosure Statement by 8/23/2021. (CDA) (Entered: 08/16/2021)	<a href="#">Send Runner to Court</a>	
1	08/13/2021	COMPLAINT against All Defendants with JURY DEMAND (Receipt # AAWDC-7208437) Attorney Matthew N Miller added to party American Pacific Mortgage Corporation(pty:pla), filed by American Pacific Mortgage Corporation. (Attachments: # 1 Civil Cover Sheet)(Miller, Matthew) (Entered: 08/13/2021)	<a href="#">View</a>	<a href="#">Add to request</a>

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